

1 THE HONORABLE JOHN C. COUGHENOUR  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 BERNARD WAITHAKA, *et al.*,

11 Plaintiffs,

12 v.

13 AMAZON.COM, INC. and AMAZON  
14 LOGISTICS, INC.,

Defendants.

No. 2:19-cv-01320-JCC

**JOINT STIPULATION TO STAY  
PROCEEDINGS PENDING  
COMPLETION OF MEDIATION;  
[PROPOSED] ORDER**

NOTE ON MOTION CALENDAR:  
April 21, 2025

JOINT STIPULATION TO STAY PROCEEDINGS  
PENDING COMPLETION OF MEDIATION;  
[PROPOSED] ORDER

## **STIPULATION**

Plaintiff Bernard Waithaka and Defendants Amazon.com, Inc. and Amazon Logistics, Inc. (“Defendants”), by and through their undersigned counsel of record, hereby stipulate and request that the Court stay the proceedings pending the completion of private mediation.

Following the denial of Plaintiff's motion for class certification and the subsequent requests to appeal that order, the Parties conferred and have agreed to participate in private mediation before any further litigation occurs on this matter.

The Parties are in the process now of selecting a mediator and setting a date for mediation.

The Parties have met and conferred, and agree that, to promote judicial efficiency, save the Court's and the Parties' time and resources, and facilitate a potential resolution through mediation, all proceedings should be stayed pending the mediation that is to be set by the Parties.

The Parties therefore stipulate to the following:

1. All proceedings in this action are stayed pending completion of the mediation to be set by the Parties, and any pending deadlines are vacated.
2. Within 90 days of today's date, or fourteen days of the conclusion of mediation, whichever comes first, the Parties will file a joint report advising the Court on the status of the case and how they suggest the case should proceed.

Stipulated by and between the Parties through their counsel of record:

JOINT STIPULATION TO STAY PROCEEDINGS  
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[PROPOSED] ORDER

1 Dated: April 21, 2025

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16 Dated: April 21, 2025

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Amazon.com, Inc. and Amazon Logistics, Inc.

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**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this 22nd day of April 2025.

John C. Conneran

The Honorable John C. Coughenour

*Presented by:*

Dated: April 21, 2025

By: *s/ Shannon Liss-Riordan*

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Dated: April 21, 2025

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By: s/ Megan Cooney

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